

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

YAAKOV APELBAUM, a New York resident,  
and XRVISION, LTD., a New York corporation,

Case No. 2:23-cv-11718

Hon. Stephen J. Murphy,

III

Plaintiffs,

v.

STEFANIE LAMBERT, a Michigan resident, and  
THE LAW OFFICE OF STEFANIE L. LAMBERT, PLLC,  
A Michigan professional limited liability company  
And BILL BACHENBERT, a Pennsylvania resident,

Defendants.

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\*admission to the Eastern District  
Of Michigan pending

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**JOINT MOTION FOR SECOND AMEND SCHEDULING ORDER**

The parties in the above-captioned matter respectfully move this Honorable Court to amend the Amended Scheduling Order in this matter, dated July 23, 2024, as set forth below. The parties exchanged their respective responses to Requests for Production of Documents on December 6, 2024. Additionally, Plaintiffs are seeking a protective order to produce documents in response to Defendant's request given the sensitive and/or privileged nature of said documents. It is understood that there are more than 900 pages of documents to be produced, of which will necessarily require time to properly examine. On December 18, 2024, Plaintiffs provided their responses to Defendant's Interrogatories and Request for Admissions. Given the nature of the claims and defenses asserted in this matter, the parties stipulate and jointly request the Amended Scheduling Order below be entered by this Honorable Court to allow adequate time to secure a protective order, review the voluminous discovery, and address any remaining issues.

Accordingly, the parties hereby jointly move the Court for the following adjustment to the Amended Scheduling Order:

<b>WITNESS LIST DISCLOSURE DUE:</b>	2/12/25
<b>EXPERT WITNESS DISCLOSURE DUE:</b>	90 days before Trial
<b>DISCOVERY ENDS:</b>	4/23/25

<b>DISPOSITIVE MOTIONS DUE:</b>	5/21/25
<b>JOINT FINAL PRETRIAL ORDER DUE:</b>	1 week before PTC
<b>FINAL PRETRIAL CONFERENCE:</b>	10/6/25
<b>MOTIONS IN LIMINE DUE:</b>	10 days before Trial
<b>TRIAL BRIEFS and PROPOSED JURY INS. DUE:</b>	5 days before Trial
<b>TRIAL:</b>	10/20/25

Respectfully submitted,  
 THE LAW FIRM OF MICHAEL J. SMITH  
 AND ASSOCIATES, PLLC

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